

Re: Questions regarding CAMx modeling for CSAPR

Tyler Fox to: David Risley

Cc: Brian Timin, Norm Possiel, Richard Haeuber, Kirk Baker

10/13/2011 04:58 PM

From:

Tyler Fox/RTP/USEPA/US

To:

David Risley/DC/USEPA/US@EPA

Cc:

Brian Timin/RTP/USEPA/US@EPA. Norm Possiel/RTP/USEPA/US@EPA. Richard

Haeuber/DC/USEPA/US@EPA, Kirk Baker/RTP/USEPA/US@EPA

Thanks, David. Appreciate the heads up and we'll have Norm, Brian and Kirk respond as appropriate.

Tyler

David Risley

Hi Tyler, I got a call today from Martin Luther wit...

10/13/2011 04:16:04 PM

From:

David Risley/DC/USEPA/US

To:

Tyler Fox/RTP/USEPA/US@EPA

Cc:

Norm Possiel/RTP/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA, Richard

Haeuber/DC/USEPA/US@EPA

Date:

10/13/2011 04:16 PM

Subject:

Questions regarding CAMx modeling for CSAPR

Hi Tyler.

I got a call today from Martin Luther with the Kentucky Division for Air Quality. He and other staff have questions about the CAMx modeling, specifically the source apportionment modeling, and IPM modeling related to the final CSAPR. He didn't give me any additional context for the questions since I made it clear from the beginning that I am not the CAMx or IPM expert. At Rick's suggestion, I'm referring him to you as the CAMx expert and Jeb as the IPM expert. We wanted to give you a heads up.

Thanks!

David

David Risley
Environmental Protection Specialist
EPA Clean Air Markets Division
Risley.David@epa.gov
202-343-9177





RE: Discussions on Transport Rule: Emissions and Air Quality Modeling

Tyler Fox to: Norm Possiel

05/05/2010 11:05 AM

From:

Tyler Fox/RTP/USEPA/US

To:

Norm Possiel/RTP/USEPA/US@EPA

Rather not as we can simply provide information and if there are detailed questions then they can be referred to them later to address. I think it is important to move this forward.

Thanks,

Tyler

Norm Possiel

Tyler, .

05/05/2010 10:59:20 AM

From:

Norm Possiel/RTP/USEPA/US
Tyler Fox/RTP/USEPA/US@EPA

To: Date:

05/05/2010 10:59 AM

Subject:

RE: Discussions on Transport Rule: Emissions and Air Quality Modeling

Tyler,

Since Marc will be out next Thurs, perhaps it would be best to set up a separate call w/OMB on emissions/projections/definition of baseline...especially in view of the sensitivity of this topic.

Norm

Tyler Fox

Marc Given Heidi's response earlier, it is not like...

05/05/2010 10:52:12 AM

From:

Tyler Fox/RTP/USEPA/US

To:

Marc Houyoux/RTP/USEPA/US@EPA

Cc:

Madeleine Strum/RTP/USEPA/US@EPA, Michael Ling/RTP/USEPA/US@EPA, Norm

Possiel/RTP/USEPA/US@EPA

Date:

05/05/2010 10:52 AM

Subject:

RE: Discussions on Transport Rule: Emissions and Air Quality Modeling

Marc

Given Heidi's response earlier, it is not likely that we will get questions beforehand so we will give a generic overview and refer to preamble and upcoming TSD sections etc.

One thing we can count on needed to provide is addressing "what is in our baseline" so if we could get a summary slide of that for 2012 and 2014 then that would be great.

Thanks,

Tyler

Marc Houyoux

Tyler, I'm out of the office on vacation that day a ...

05/05/2010 10:48:29 AM

From: To: Marc Houyoux/RTP/USEPA/US
Tyler Fox/RTP/USEPA/US@EPA

Cc:

Norm Possiel/RTP/USEPA/US@EPA, Madeleine Strum/RTP/USEPA/US@EPA, Michael

Ling/RTP/USEPA/US@EPA

Date:

05/05/2010 10:48 AM

Subject:

RE: Discussions on Transport Rule: Emissions and Air Quality Modeling

Tyler,

and I've delegated the meeting invite to Madeleine. Alison is also out of the office that day so is unavailable in her customary role as TR backup person.

Please make sure Madeleine gets included on the questions in advance.

Marc

Marc Houyoux

Emission Inventory and Analysis Group Office of Air Quality Planning and Standards

US/EPA (C339-02)

Research Triangle Park, NC 27711

voice: (919) 541-3649

Tyler Fox

Heidi, I have scheduled this 1 hour discussion fo...

05/04/2010 08:21:43 PM

From:

Tyler Fox/RTP/USEPA/US

To:

Cc:

"King, Heidi R." <Heidi_R._King@omb.eop.gov>
Brian Timin/RTP/USEPA/US@EPA, Kevin Culligan/DC/USEPA/US@EPA, Marc Houyoux/RTP/USEPA/US@EPA, Norm Possiel/RTP/USEPA/US@EPA, Richard

Wayland/RTP/USEPA/US@EPA, Sam Napolitano/DC/USEPA/US@EPA

Date:

05/04/2010 08:21 PM

Subject:

RE: Discussions on Transport Rule: Emissions and Air Quality Modeling

Heidi,

I have scheduled this 1 hour discussion for next Thursday, May 13th from 2 to 3 pm with conference line In order for us to best prepare, please let us know what general and specific questions you have on the air quality modeling so we can provide those responses next week.

Thanks,

Tyler

"King, Heidi R."

Thank you so much, Tyler. Sooner is better than...

05/04/2010 05:10:19 PM

From:

"King, Heidi R." <Heidi_R._King@omb.eop.gov>

To:

Tyler Fox/RTP/USEPA/US@EPA

Cc:

Brian Timin/RTP/USEPA/US@EPA, Kevin Culligan/DC/USEPA/US@EPA, Marc Houyoux/RTP/USEPA/US@EPA, Norm Possiel/RTP/USEPA/US@EPA, Richard

Wayland/RTP/USEPA/US@EPA, Sam Napolitano/DC/USEPA/US@EPA

Date:

05/04/2010 05:10 PM

Subject:

RE: Discussions on Transport Rule: Emissions and Air Quality Modeling

Thank you so much, Tyler. Sooner is better than later! How about 2-3pm on Thursday 5/13?

I've held calendars internally here. Also -- if you think it would be better to hold more than an hour, we could either start 1/2 hour earlier or run 1/2 hour later.

Best,

heidi

----Original Message----

From: Fox. Tyler@epamail.epa.gov [mailto:Fox.Tyler@epamail.epa.gov]

Sent: Tuesday, May 04, 2010 4:04 PM

To: King, Heidi R.

Cc: Timin.Brian@epamail.epa.gov; Culligan.Kevin@epamail.epa.gov; Houyoux.Marc@epamail.epa.gov; Possiel.Norm@epamail.epa.gov; Wayland.Richard@epamail.epa.gov; Napolitano.Sam@epamail.epa.gov Subject: RE: Discussions on Transport Rule: Emissions and Air Quality Modeling

Heidi

We would be able to meet next week anytime on Thurs (13th) or Friday (14th) so we can set the stage for your review of the TSDs in an efficient manner. Please let us know what times might work best and we can schedule. If those days don't work then lets shoot for Monday or Tuesday the following week.

Thanks,

Tyler

From:
"King, Heidi R." < Heidi_RKing@omb.eop.gov>
 >
To:
Tyler Fox/RTP/USEPA/US@EPA
*> Cc:
>

Richard Wayland/RTP/USEPA/US@EPA, Norm Possiel/RTP/USEPA/US@EPA, Mar Houyoux/RTP/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA, Sam Napolitano/DC/USEPA/US@EPA, Kevin Culligan/DC/USEPA/US@EPA
05/04/2010 10:46 AM
 Subject:
RE: Discussions on Transport Rule: Emissions and Air Quality Modeling
>*
Hi Tyler,

Thanks for your note. Could you suggest two or three alterative times that EPA could provide a briefing for the interagency group? Sounds like it may be after May 17, if work is in progress.

Thanks,

heidi

----Original Message----

From: Fox.Tyler@epamail.epa.gov [mailto:Fox.Tyler@epamail.epa.gov]

Sent: Monday, May 03, 2010 7:19 PM

To: King, Heidi R.

Cc: Wayland.Richard@epamail.epa.gov; Possiel.Norm@epamail.epa.gov; Houyoux.Marc@epamail.epa.gov; Timin.Brian@epamail.epa.gov; Napolitano. Sam@epamail. epa.gov; Culligan. Kevin@epamail. epa.gov Subject: Discussions on Transport Rule: Emissions and Air Quality Modeling

Heidi

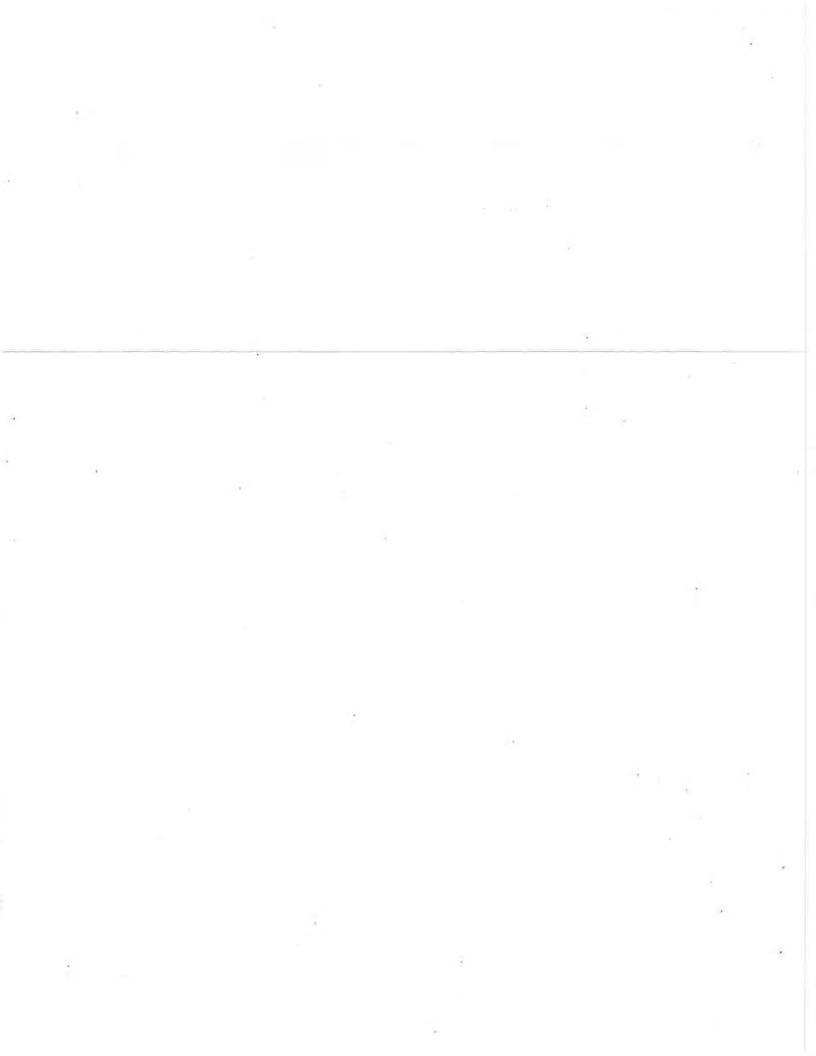
I wanted to touch base with you on the air quality modeling for the Transport Rule (TR) and how we might proceed to engage on discussions and delivery of technical TSDs. Given the ongoing work, staff in the emissions and air quality modeling groups are completing the draft TSDs for emissions and air quality modeling for distribution to you and the workgroup on May 17th (extended past May 14th so we can incorporate internal review comments over that weekend). We would be happy to meet with you and walk through the TSDs by the middle of next week so you have a full understanding of what we have done here and to allow us to address specific questions or topics of interest to OMB and Interagency reviewers. In preparation, it would also be valuable for us to get your specific questions early on so we can be sure to cover those for our discussion(s).

We think that this would be the most efficient approach to moving forward and allow us to complete the documentation while informing you and addressing questions in the interim.

Please let us know if this approach works for you and we can work on scheduling our next discussion.

Thanks,

Tyler Fox Air Quality Modeling Group, Leader USEPA/OAQPS, C439-01 109 TW Alexander Drive RTP, NC 27711 (919) 541-5562





Fw: Overview Presentation for OMB et al on the Transport Rule at 2 pm. Tuesday, May 17th

Norm Possiel to: Tyler Fox, Brian Timin, Alison Eyth

05/16/2011 03:21 PM

This new

Norm Possiel/RTP/USEPA/US

Tyler Fox/RTP/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA, Alison

Eyth/RTP/USEPA/US@EPA

This message has been replied to.

See below for "final" presentation to OMB on TR1.

---- Forwarded by Norm Possiel/RTP/USEPA/US on 05/16/2011 03:20 PM ----

From.

Sam Napolitano/DC/USEPA/US

To:

Richard Wayland/RTP/USEPA/US@EPA, Michael Ling/RTP/USEPA/US@EPA, Thomas

Gillis/DC/USEPA/US@EPA, DavidA Evans/DC/USEPA/US@EPA, Jim

Ketcham-Colwill/DC/USEPA/US@EPA, Tamara Saltman/DC/USEPA/US@EPA, Meg

Victor/DC/USEPA/US@EPA, Dwight Alpern/DC/USEPA/US@EPA, Tim

Smith/RTP/USEPA/US@EPA, Ron Evans/RTP/USEPA/US@EPA

Cc:

Sonja Rodman/DC/USEPA/US@EPA, Jeb Stenhouse/DC/USEPA/US@EPA, Norm

Possiel/RTP/USEPA/US@EPA, Beth Murray/DC/USEPA/US@EPA, Joseph Goffman/DC/USEPA/US@EPA, Janet McCabe/DC/USEPA/US@EPA, Beth Craig/DC/USEPA/US@EPA, Richard Haeuber/DC/USEPA/US@EPA, Marc

Houyoux/RTP/USEPA/US@EPA

Date:

05/16/2011 03:05 PM

Subject:

Overview Presentation for OMB et al on the Transport Rule at 2 pm, Tuesday, May 17th

Here is the call-in information for tomorrow's briefing with OMB and the rest of the interagency review group for the Transport Rule. Also, please find attached the presentation that Jeb and Norm will work from (just sent to OMB).

Jeb, Sonja and I will be at OMB for the meeting.

BRIDGE NUMBER: 202-395-6392

CONFEREE PASSCODE: 306 5818

OMB Briefing on Final Transport Rule_final_05-16-11_v2.pptx



Quick Question on Response to TR1 Comments on Need for "Uncertainty Analyses"

Norm Possiel to: Tyler Fox, Bryan Hubbell Cc: Neal Fann

06/16/2011 12:32 AM

Fasimo Noi

Norm Possiel/RTP/USEPA/US

Tyler Fox/RTP/USEPA/US@EPA, Bryan Hubbell/RTP/USEPA/US@EPA

Neal Fann/RTP/USEPA/US@EPA

History This message has been replied to.

Tyler/Bryan,

We received comments on the TR1 proposal from the George Washington University Regulatory Studies Center that said, in part, that EPA needs to conduct an uncertainty analysis as part of the RIA for this rule. One specific aspect of the GWU's comments focuses on the need to quantify the uncertainty in our air quality modeling of interstate ozone and PM2.5 contributions. (Our contribution estimates are based on source apportionment modeling applied in a relative sense to ambient mesurements similar to the way we project design values.)

GWU says that we should quantify the uncertainty in these contribution estimates to help inform the appropriate precision for the air quality thresholds used to determine whether upwind states are covered by the wife (Recall that we are using thresholds equivalent to 1 percent of the applicable NAAQS to determine whether the contribution from each upwind state is large enough for that state to be included in the Transport Rule. The threshold is 0.8 ppb for ozone, 0.15 ug/m3 for annual PM, and 0.35 ug/m3 for daily PM).

GWU cites (incorrectly) recommendations on air quality modeling in the 2002 NRC report "Estimating the Public Health Benefits of Proposed Air Pollution Regulations" as part of their argument that EPA should quantify the uncertainty in our air quality modeling predictions.

GWU also points to two studies as a basis for saying that there is large variability (which they claim is an indication of large uncertainty) in air quality outcomes across multiple air quality models. GWU cites a 2009 NRC report "Hidden Costs of Energy: Unpriced Consequences of Energy Production and Use" which relied on the APEEP model for air quality prediction. The NRC report references a report which describes the construct of the APEEP model and includes a comparison of model performance between AEEP and CMAQ "The Air Pollution Emissions Experiments and Policy Analysis Model" (Muller and Mendelsohn, 2006). GWU also cites a report by Krupnick, et al "Not a sure thing. Making regulatory choices in the face of uncertainty" to claim that there is a large variation in benefit outcomes across multiple models.

The following file contains the entire comment document from GWU



EPA-HQ-OAR-2009-0491-2573.1.pdf

This file contains the portion of GWU's comments that pertain to their comment that EPA should quantify the uncertainty in our air quality modeling.



GWU AQ Modeling Comments.doc

I assume that you are familiar with the 2002 and 2006 NRC reports cited by GWU. I can provide the links

to these reports...if need be.

Before putting pen to paper on the responses to the GWU comments I thought I would check with you guys to see if you have had to deal with similar comments as part of past and/or if you have opinions on the scientific credibility and appropriateness of the APEEP model (which appears to be based on your old friend the CRDM) and the tools used in the Krupnick report. If so, it might be helpful for me to use what you have already developed, at least as a starting point, for preparing our response to the GWU comments. Let me know if you have any existing materials that might be helpful in this regard.

Thanks,

Norm



Agenda for today's Transport Rule Workgroup Call. Call in 919 541 4154 For RTP, will use Room C535i

Adina Wiley, Alison Eyth, Alison Simcox, Anne Tim Smith to: Arnold, Beth Murray, Bill Maxwell, Brian Fisher,

09/23/2010 08:43 AM

Brian Timin, DavidA Evans, Dwight Alpern, Elyse

Cc: Rhea Jones

Figni

Tim Smith/RTP/USEPA/US

Adina Wi

Adina Wiley/R6/USEPA/US@EPA, Alison Eyth/RTP/USEPA/US@EPA, Alison Simcox/R1/USEPA/US@EPA, Anne Arnold/R1/USEPA/US@EPA, Beth Murray/DC/USEPA/US@EPA, Bill Maxwell/RTP/USEPA/US@EPA, Brian

Rhea Jones/RTP/USEPA/US@EPA

1. Structural changes to Workgroup

- -- CAMD will assume lead for TR 1. (Kevin and others: any specifics you can share on staffing would be helpful). Implications:
- * RAPIDS entry
- * Control correspondence
- * etc
- * OAQPS will provide
- * OAQPS will continue to provide same modeling support, and will address comments on issues we wrote up
- * need to discuss who continues Gobeail's Pechan Work Assignment
- -- OAQPS will retain lead for TR 2.
- * CAMD will continue to provide IPM input for EGUs, support to "AQAT" if used, and reg-writing support for EGU
- 2. Workgroup calls.

OAQPS and CAMD suggest changing current workgroup call schedule:

- * currently every week 9:30 -11 eastern covering both TR 1 and TR 2
- * starting next week, change to TR 1 every other week, TR 2 every other week, with additional ad hoc calls as needed
- * next week will be TR 2
- * because adding region 9 to workgroup, will change TR 2 calls to 1-2 Eastern (or alternative afternoon time if that doesn't work)
- 3. Analytic blueprint for TR 2.

Here is latest version. Would like to know status of your review of this,.... would like to discuss on next week's call



Redraft per Larry Sorrels comments preliminary draft blueprint for workgroup discussiont TR2 proposal LSedits.docx

Tim Smith EPA/OAQPS Mail Code C539-04 Research Triangle Park, NC 27711 Phone 919 541 4718 Fax 919 541 0824

Overnight mail address:

EPA Mail Code C539-04 109 TW Alexander Drive Research Triangle Park, NC 27709



First Draft of Preliminary Analytic Blueprint for "Transport Rule 2"

Adina Wiley, Alison Eyth, Alison Simcox, Anne

Tim Smith 10. Arnold, Beth Murray, Bill Maxwell, Brian Fisher,

09/16/2010 05:50 PM

Brian Timin, DavidA Evans, Dwight Alpern, Elyse

Cc Rhea Jones, Elizabeth Palma, Rory Mays

Tim Smith/RTP/USEPA/US

Adina Wiley/R6/USEPA/US@EPA, Alison Eyth/RTP/USEPA/US@EPA, Alison Simcox/R1/USEPA/US@EPA, Anne Arnold/R1/USEPA/US@EPA, Beth Murray/DC/USEPA/US@EPA, Bill Maxwell/RTP/USEPA/US@EPA, Brian

Rhea Jones/RTP/USEPA/US@EPA, Elizabeth Palma/RTP/USEPA/US@EPA, Rory

Mays/R9/USEPA/US@EPA

I would like to discuss this on next workgroup call... comments/thoughts welcome... this will be a work in progress over next few weeks.. I've shared this in bits and pieces with others, but wanted to distribute so you will see where I am on this..



1st draft of preliminary draft blueprint for workgroup discussiont docx

This is definitely an internal EPA document at this point, thanks for not distributing outside WG...

Also, for transport (2), we are adding Region 9 to the workgroup, so 6:30-8:00 an Pacific Coast time is probably not a reasonable for workgroup calls! For calls discussing TR 2, we need to pick a later time in the day... Sonja, I know you have standing meeting at 11 eastern... Does anyone have standing conflict on Thursday pm?

Tim Smith EPA/OAQPS Mail Code C539-04 Research Triangle Park, NC 27711 Phone 919 541 4718 Fax 919 541 0824

Overnight mail address:

EPA Mail Code C539-04 109 TW Alexander Drive Research Triangle Park, NC 27709

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Briefing Materials for Updates on Plans for Transport Rule 1 - Final Air Quality Modeling and the Wintertime PM 2.5 Issue

Brian Mclean, Brian Timin, David Risley,

Norm Possiel to: Diana Esher, George Bowker, Jeb Stenhouse,

12/15/2010 05:18 PM

Jim Ketcham-Colwill, Joseph Goffman, Kevin Addie Johnson, Amit Srivastava, Cate Hight, Cynthia Browne, Don

Cc. Zinger, Lala Alston, Tina Murphy, Marc Houyoux, Alison Eyth, Rhea

Jones

FIGURE.

Norm Possiel/RTP/USEPA/US

(Teol

Brian Mclean/DC/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA, David Risley/DC/USEPA/US@EPA, Diana Esher/R3/USEPA/US@EPA, George Bowker/DC/USEPA/US@EPA, Jeb Stenhouse/DC/USEPA/US@EPA, Jim

Addie Johnson/DC/USEPA/US@EPA, Amit Srivastava/DC/USEPA/US@EPA, Cate

Hight/DC/USEPA/US@EPA, Cynthia Browne/DC/USEPA/US@EPA, Don

Zinger/DC/USEPA/US@EPA, Lala Alston/RTP/USEPA/US@EPA, Tina

Elicitory:

This message has been replied to.

All.

Attached below is the briefing package for the TR1 Air Quality Modeling and Wintertime PM2.5 Issue discussion on Wednesday at 10:00 am.

Norm Possiel EPA/OAR/OAQPS (919) 541-5692



AQ Modeling for TR1 & Wintertime PM_12_16_10.pptx

Forwarded by Norm Possiel/RTP/USEPA/US on 12/15/2010 05:13 PM -----



Required:

Updates on Plans for Transport Rule 1 - Final Air Quality Modeling and the Wintertime PM 2.5 Issue

Thu 12/16/2010 10:00 AM - 10:45 AM

Attendance is for Norm Possiel

Chair: Sent By:

Gina McCarthy/DC/USEPA/US Cindy Huang/DC/USEPA/US

Location:

5400 Video needed, conference 1-866-299-3188 access; 202-564-7412

This entry has an alarm. The alarm will go off before the entry starts.

Brian Mclean/DC/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA, David Risley/DC/USEPA/US@EPA, Diana Esher/R3/USEPA/US@EPA, George Bowker/DC/USEPA/US@EPA, Jeb Stenhouse/DC/USEPA/US@EPA, Jim Ketcham-Colwill/DC/USEPA/US@EPA, Joseph Goffman/DC/USEPA/US@EPA, Kevin

Culligan/DC/USEPA/US@EPA, Kevin McLean/DC/USEPA/US@EPA, Meg.

Victor/DC/USEPA/US@EPA, Michael Ling/RTP/USEPA/US@EPA, Norm

Possiel/RTP/USEPA/US@EPA, Richard Wayland/RTP/USEPA/US@EPA, Sam

Napolitano/DC/USEPA/US@EPA, Sonja Rodman/DC/USEPA/US@EPA, Steve Page/RTP/USEPA/US@EPA, Tamara Saltman/DC/USEPA/US@EPA, Tim

Smith/RTP/USEPA/US@EPA, Tyler Fox/RTP/USEPA/US@EPA

Addie Johnson/DC/USEPA/US@EPA, Amit Srivastava/DC/USEPA/US@EPA, Cate Optional:

Hight/DC/USEPA/US@EPA, Cynthia Browne/DC/USEPA/US@EPA, Don Zinger/DC/USEPA/US@EPA, Lala Alston/RTP/USEPA/US@EPA, Tina

Murphy/DC/USEPA/US@EPA

Description



McCarthy Mtg Reg Updates on Plans for TR 1 Final AQ Modeling and the Wintertime PM 2.5 Issue.doc

Personal Notes



Re: Fw: URGENT: Briefing Materials Needed: Updates on Plans for Transport Rule 1 - Final Air Quality Modeling and the Wintertime PM 2.5

Issue 🖺

Norm Possiel to: Tyler Fox

12/15/2010 02:21 PM

PAGING:

Norm Possiel/RTP/USEPA/US
Tyler Fox/RTP/USEPA/US@EPA

JAPETON,

This message has been replied to.

So, you mean with EPA logo and/or some type of background??

Tyler Fox

Norm FYI--I have heard that Gina likes profess...

12/15/2010 02:18:24 PM

From:

Tyler Fox/RTP/USEPA/US

To:

Norm Possiel/RTP/USEPA/US@EPA

Date:

12/15/2010 02:18 PM

Subject:

Re: Fw: URGENT: Briefing Materials Needed: Updates on Plans for Transport Rule 1 - Final Air

Quality Modeling and the Wintertime PM 2.5 Issue

Norm

FYI--I have heard that Gina likes professional looking slides so not sure if Pete South or others will comment on need for such but just wanted you to be aware.

Tyler

Norm Possiel

Chet, Attached below is the revised briefing for...

12/15/2010 02:12:53 PM

From:

Norm Possiel/RTP/USEPA/US

To:

Richard Wayland/RTP/USEPA/US@EPA

Cc:

Sam Napolitano/DC/USEPA/US@EPA, Tyler Fox/RTP/USEPA/US@EPA, Jeb Stenhouse/DC/USEPA/US@EPA, Meg Victor/DC/USEPA/US@EPA, George

Bowker/DC/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA

Date:

12/15/2010 02:12 PM

Subject:

Fw: URGENT: Briefing Materials Needed: Updates on Plans for Transport Rule 1 - Final Air

Quality Modeling and the Wintertime PM 2.5 Issue

Chet.

Attached below is the revised briefing for Gina which Pete South is sending to Steve for his review before it goes to Gina. Pete is going to let me know by late today if Steve has any comments. Once I get the "OK" from Pete, I'll send it out to the meeting participants.

Norm

---- Forwarded by Norm Possiel/RTP/USEPA/US on 12/15/2010 02:09 PM -----

From:

Norm Possiel/RTP/USEPA/US

To:

Jean Walker/RTP/USEPA/US@EPA

Co:

Kelly Hayes/RTP/USEPA/US@EPA, Maria Sanders/RTP/USEPA/US@EPA, Peter

South/RTP/USEPA/US@EPA

Date:

12/15/2010 01:29 PM

Subject:

Re: URGENT: Briefing Materials Needed: Updates on Plans for Transport Rule 1 - Final Air Quality Modeling and the Wintertime PM 2.5 Issue

Jean,

Here's a copy of the briefing materials for the briefing to Gina on Transport Rule 1, tomorrow at 10:00 am

Norm

[attachment "AQ Modeling for TR1 & Wintertime PM_12-16-10_AA.pptx" deleted by Tyler Fox/RTP/USEPA/US]

Jean Walker

Hi Norm, We need them as soon as possible b ...

12/15/2010 11:40:12 AM

Norm Possiel

All, I am finalizing the briefing now based on co...

12/15/2010 11:25:37 AM

Jean Walker

Hi Kelly, Could you please check the status of t ...

12/15/2010 11:23:34 AM



Fw: Transport SIP -- prongs 1 & 2

Richard Wayland to: Tyler Fox, Kirk Baker, Rhea Jones, timin, brian

03/26/2010 11:50 AM

From:

Richard Wayland/RTP/USEPA/US

To

Tyler Fox/RTP/USEPA/US@EPA, Kirk Baker/RTP/USEPA/US@EPA, Rhea Jones/RTP/USEPA/US@EPA, timin.brian@epa.gov

Tyler,

I think we should set up a call with Region 9 on this issue to talk about the modeling and the appropriate use of these data. I also agree with Brian that their CAIR connection has serious flaws, given what we know about CAIR, See Jeanhee's note blow and let me know if you and your folks want to get on the phone with Region 9.

Thanks, Chet

Richard A. "Chet" Wayland Director, Air Quality Assessment Division U.S. EPA Office of Air Quality Planning & Standards (919) 541-4603

---- Forwarded by Richard Wayland/RTP/USEPA/US on 03/26/2010 11:47 AM ----

From:

Jeannee Hong/R9/USEPA/US

To:

Richard Wayland/RTP/USEPA/US@EPA, Carol Bohnenkamp/R9/USEPA/US@EPA, Geoffrey

Wilcox/DC/USEPA/US@EPA

Cc:

Tyler Fox/RTP/USEPA/US@EPA, Kirk Baker/RTP/USEPA/US@EPA, Rhea

Jones/RTP/USEPA/US@EPA

Date:

03/26/2010 11:11 AM

Subject:

Re: Fw: Transport SIP -- prongs 1 & 2

Richard -- we certainly would not use the data without OAQPS permission. That was simply our expectation at staff level (that we might agree on some limited element of Kirk's analysis that could provide a technical basis for our evaluation), but our management has not yet made any concrete decisions. We are preparing to brief upper management next week, so we will certainly pass on your input (and Rhea's from yesterday) at that time.

I'm available between 9-12 pacific this morn if you and others are available to talk. Carol Bohnencamp is our point person on modeling questions so please feel free to contact her as well, or perhaps we could arrange a short conference call this morning. Thanks much.

Jeanhee Hong Assistant Regional Counsel US EPA Region 9 phone: (415) 972-3921

phone: (415) 972-3921 fax: (415) 947-3570

----Richard Wayland/RTP/USEPA/US wrote: ----

To: Jeanhee Hong/R9/USEPA/USGEPA From: Richard Wayland/RTP/USEPA/US

Date: 03/26/2010 05:23AM

Cc: Tyler Fox/RTP/USEPA/US@EPA, Kirk Baker/RTP/USEPA/US@EPA, Rhea

Jones/RTP/USEPA/US@EPA

Subject: Fw: Wransport SIP -- prongs 1 & 2

-

Jeanhee,

Before this gets too far down the road, we have some significant reservations about the decision to use the source appoint townent modeling in this manner. It was not our understanding as you can see from the email below. We should probably have a conversation with the key folks involved in this decision before proceeding down this path, Please let me know if you can find time to discuss this with my modeling folks here in RTP.

Thanks, Chet Wayland

Richard A. "Chet" Wayland

Director, Air Quality Assessment Division

U.S. EPA Office of Air Quality Planning & Standards

(919) 541-4603

---- Forwarded by Richard Wayland/RTP/USEPA/US on 03/26/2010 08:20 AM ----

From:

Kirk Baker/RTP/USEPA/US

To: Cc:

Tyler Fox/RTP/USEPA/US@EPA

Richard Wayland/RTP/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA

Date:

03/25/2010 02:22 PM

Subject:

Fw: Transport SIP -- prongs 1 & 2

Region 9 decided they are going to use the western transport source apportionment modeling we did to support their disapproval of California transport SIP.

This actually wasn't what we agreed to at all. We agreed they would rely on analysis done by the State of Nevada and possibly analysis done by the WRAP. Using the source apportionment modeling could force the disapproval of the rest of the western State Transport SIPs (under the 1997 ozone NAAQS).

Kirk

---- Forwarded by Kirk Baker/RTP/USEPA/US on 03/25/2010 02:20 PM ----

Jeanhee Hong/R9/USEPA/US

Geoffrey Wilcox/DC/USEPA/US@EPA, Sara Schneeberg/DC/USEPA/US@EPA,

Kirk Baker/RTP/USEPA/US@EPA, Rhea Jones/RTP/USEPA/US@EPA

Cc:

Rory Mays/R9/USEPA/US@EPA, Carol Bohnenkamp/R9/USEPA/US@EPA

Date:

03/25/2010 01:11 PM

Subject:

Transport SIP -- prongs 1 & 2

CONFIDENTIAL / INTERNAL AND DELIBERATIVE / ATTORNEY-CLIENT COMMUNICATION

Geoff, et. al. -- following up on our discussion a few weeks ago about Kirk's preliminary modeling analyses (for the "maintenance prong") and potential options for California's transport SIP, we'd like to decide on a general direction to present to our management, with your input. In short, we expect to convey to CARB that the state's current transport SIP submittal is not approvable, in light of the DC Circuit's decision on the CAIR WWW and related developments, and advise the state to submit a supplemental submittal that:

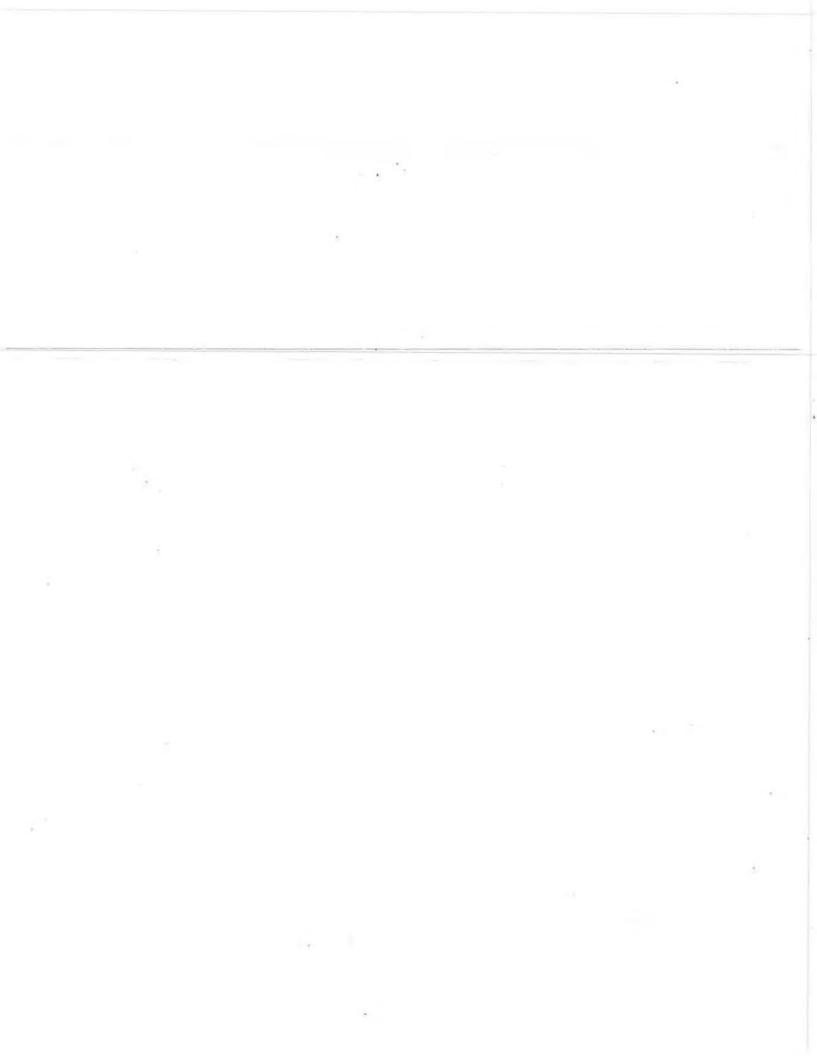
- 1. addresses prong 1 (significant contribution to nonattainment) by providing a quantitative analysis of the pollution from CA that may be contributing to ozone or PM2.5 levels in the nearest nonattainment areas (in other states) for the 1997 8-hour ozone and PM2.5 standards (Nevada for ozone, Montana for PM2.5)
- 2. addresses prong 2 (interference with maintenance) by providing a quantitative analysis of the pollution from CA that may be contributing to ozone or PM2.5 levels at monitors in attainment areas (in other states) for the 1997 8-hour ozone and PM2.5 standards that are recording pollution levels close to either standard (e.g., probably just monitors in Arizona and Nevada, possibly also Colorado, Oregon);
- 3. evaluates the cost of controls that would be necessary to reduce the pollution transport discussed in 1 & 2, and either (a) establishes requirements to monitor and/or control such pollution, or (b) provides a basis, consistent with the rationale provided in the CAIR wave (to the extent it remains valid), for requiring no further controls. [Note: we expect the state's preference will be to conclude that no highly cost-effective controls are available, but we didn't think it necessary to foreclose the option of establishing some requirements (e.g., monitoring) that might provide a starting point for addressing pollution transport going forward.]

Importantly, for the first and second points above, we expect we will need to rely to some extent on Kirk's preliminary modeling analyses -- at least for purposes of our own evaluation of CA's submittal -- since that is the only relevant technical information that we're aware of. We recognize the sensitivity here and the concerns that this data could open up more issues, but on the other hand, we feel obliged to make use of good and valid data... and this is the only such data we have.

Thoughts? We will be briefing upper management here in R9 next wednesday, so we'd be grateful for any advice you have (even preliminary advice) before then. Thanks.

Jeanhee Hong Assistant Regional Counsel US EPA Region 9 (ORC-2) 75 Hawthorne Street San Francisco, CA 94105

Direct line: (415) 972-3921 Facsimile: (415) 947-3570





Fw: Cost for CAIR-2

Tyler Fox to: Richard Wayland

Cc: Norm Possiel, Brian Timin

From:

Tyler Fox/RTP/USEPA/US

To:

Richard Wayland/RTP/USEPA/US@EPA

Cc:

Norm Possiel/RTP/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA

Sending this as background since not needed at present per my e-mail.

Chet

I believe that Larry Kercher left you a voicemail here as well as Norm on the need for a cost estimate for air quality modeling in support of a new "CAIR." As Norm summarizes below, there are a number of factors that would influence our cost estimate so it does depend on aspects that are likely undefined as this point in time.

The typical regulatory analysis would be in the \$200-250k range (each for proposal and final rule so total of \$500k); however, the scope here is broader than typical modeling work since it involves supporting the legal basis of the rule to define the trading region (or, if trading not an option, then the command-n-control approach) with zero-out modeling or source apportionment. Thus, the costs could get up to the \$350k total.

We can certainly talk more with Brian and Norm so that we can try to get answers to the attached questions and refine our estimates accordingly.

Thanks,

Tyler

---- Forwarded by Tyler Fox/RTP/USEPA/US on 09/29/2008 03:54 PM -----



Norm Possiel/RTP/USEPA/US

To Tyler Fox/RTP/USEPA/US@EPA

09/29/2008 04:15 PM

09/29/2008 03:52 PM

cc Brian Timin/RTP/USEPA/US@EPA

Subject Cost for CAIR-2

Tyler,

As we discussed, Larry Kercher left me a voice message asking for a cost estimate for performing air quality modeling to support a new "CAIR". Larry indicated that this might come up at a budget meeting with OMB on Tuesday.

The costs for this depend on a number of factors, including:

- If the rule is to address transport relative to the 1997 O3 and PM2.5 NAAQS as well as the more recent NAAQS, then we will need to do contribution modeling for multiple future years which correspond to the attainment years for each NAAQS.
- For CAIR, our contribution modeling was based on State-by-State zero-out plus source apportionment modeling for O3, but only zero-out modeling for PM2.5 since we did not have PM source apportionment modeling tools available at that time (but we do now). Would the new CAIR modeling be based on only

source apportionment modeling for O3 and PM2.5, or would we also need to do the zero-out modeling for both pollutants? Doing just source apportionment modeling would be less costly because the contribution information can be obtained from far fewer runs than the individual State-by-State zero-out modeling.

- If we're going to address interstate contributions for the new (lower) O3 NAAQS, will we be asked to model contributions in the West as well as in the East?
- Will there be a single control scenario (as in CAIR) or will we be asked to model the effects of multiple control options (e.g., interstate trading vs intrastate trading vs no trading)?

For recent rules like O3 NAAQS, Loco/Marine, and SECA we sent approx 150 - 250K. This covers a single base year, 1 to 2 future baselines, and several control cases. I would think that the costs of the new CAIR could exceed this range, depending on the scope issues identified above.

Brian, please reply with comments or other information on this.

Tyler, I will let Larry know that you or Chet will get back to him on this.

Thanks,

Norm



Re: Fw: notes from yesterday

Norm Possiel to: Tyler Fox

Cc: Brian Timin

Norm Possiel/RTP/USEPA/US

From: To:

Tyler Fox/RTP/USEPA/US@EPA

Cc:

Brian Timin/RTP/USEPA/US@EPA

Will do.

A few other points, FYI.

- I had a brief conversations with Doug yesterday to give him a "heads up" on the increased likelihood of needing emissions-related support for a new CAIR. I told him I'd forward to him Tim's summary of the conversation with Bill. I also discussed the potential Emissions/AQ modeling scope of a new CAIR with the folks on the Emissions Modeling Team yesterday.....again as a "heads-up".
- I have counselled Tim on several occasions about the need and importance of Group Leader/ADD/DD involvement in this and the need for a formal team structure and process.
- BTW, the thought of completing a full CAIR interstate contribution analysis for ozone and PM...along with modeling alternative remedies....and being ready to present this to a new administration by the end of next March (five months) is very scary....especially in light of other work already planned. On Monday, the three of us can discuss how to proceed with defining options/alternatives/implications to present to Chet

Norm

Tyler Fox/RTP/USEPA/US

Tyler Fox/RTP/USEPA/US

10/24/2008 01:13 PM

To Norm Possiel/RTP/USEPA/US@EPA

cc Brian Timin/RTP/USEPA/US@EPA

Subject Re: Fw: notes from yesterday

Agreed, I don't want to be subject to the contradicts that are inevitable with triangulated interactions and also want to be sure that as you indicate we in AQMG determine the best technical means to address the questions and then have the needed interactions to make a final decision.

Please schedule a meeting for the three of us and I can talk with Doug afterwards or separately to see where he is here.

Thanks,

Tyler

Norm Possiel/RTP/USEPA/US wrote on 10/24/2008 01:10:11 PM:

- > I think that you, Brian and I should talk internally (perhaps
- > include Doug) on Monday to make sure we have identified and properly

10/24/2008 01:28 PM

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> characterized the issues.....then we should talk to Chet together.
> Bill's comment that we should stick with zero-out vs source
> apportionment for PM contradicts his earlier statement in the first
> meeting that we should update the contribution analysis using the
> latest available data and tools. In the NOx SIPCall and CAIR, folks
> depended on us to make recommendations on AQ analysis data and
> tools, but there were questions and push-backs on some aspects for
> which we needed to provide a basis/justification for our
> recommendations....which is OK by me.
> Norm
> Tyler Fox/RTP/USEPA/US
> 10/24/2008 11:31 AM
> To
> Norm Possiel/RTP/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA
> CC
> Subject
> Fw: notes from yesterday
> I hope you both are just as concerned about having "filtered"
> conversations about modeling and technical aspects here with Bill H
> (and others for that matter). I plan to bring this up with Chet so
> we can get some more effective and transparent process in place like
> before. Please advise and/or stop me beforehand if you have other thoughts.
> Tyler
> ---- Forwarded by Tyler Fox/RTP/USEPA/US on 10/24/2008 11:26 AM ----
> Tim Smith/RTP/USEPA/US
> 10/24/2008 11:25 AM
> To
> Steven Silverman/DC/USEPA/US@EPA, Sonja Rodman/DC/USEPA/US@EPA,
> Geoffrey Wilcox/DC/USEPA/US@EPA, Jim Ketcham-
> Colwill/DC/USEPA/US@EPA, Ellen Kurlansky/DC/USEPA/US@EPA, Carla
> Oldham/RTP/USEPA/US@EPA, Rhea Jones/RTP/USEPA/US@EPA, Sam
> Napolitano/DC/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA, Jenny
> Noonan/RTP/USEPA/US@EPA, Kelly Rimer/RTP/USEPA/US@EPA, Norm
> Possiel/RTP/USEPA/US@EPA, Peter South/RTP/USEPA/US@EPA, Kevin
\verb|-- Culligan/DC/USEPA/US@EPA, Larry Kertcher/DC/USEPA/US@EPA, Richard \\
> Haeuber/DC/USEPA/US@EPA, Tamara Saltman/DC/USEPA/US@EPA, Bill
> Harnett/RTP/USEPA/US@EPA, Rich Damberg/RTP/USEPA/US@EPA, Cristina
> Fernandez/R3/USEPA/US@EPA, Maria Pino/R3/USEPA/US@EPA, Marilyn
> Powers/R3/USEPA/US@EPA, Dick Schutt/R4/USEPA/US@EPA, Lynorae
> Benjamin/R4/USEPA/US@EPA, Steve Scofield/R4/USEPA/US@EPA, Todd
> Hawes/RTP/USEPA/US@EPA, Michael Jay/R7/USEPA/US@EPA, Douglas
> Aburano/R5/USEPA/US@EPA, Adina Wiley/R6/USEPA/US@EPA, Alison
> Simcox/R1/USEPA/US@EPA, Robert Mcconnell/R1/USEPA/US@EPA, Kenneth
> Fradkin/R2/USEPA/US@EPA, Joshua Tapp/R7/USEPA/US@EPA, Robert
> Patrick/R7/USEPA/US@EPA, MarkA Smith/R7/USEPA/US@EPA, Gavin
> Lau/R2/USEPA/US@EPA, RobertJ Wayland/RTP/USEPA/US@EPA, Bill
```

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> Maxwell/RTP/USEPA/US@EPA, Meg Victor/DC/USEPA/US@EPA, Roy
> Huntley/RTP/USEPA/US@EPA
> Tyler Fox/RTP/USEPA/US@EPA
> Subject
> notes from yesterday
> Here are notes from team meeting, and from later conversation with
> Bill Harnett
> [attachment "Notes from T Smith conversation with Bill H 10 23 08.
> doc" deleted by Tyler Fox/RTP/USEPA/US] [attachment "T Smith Summary
> of 10 23 08 CAIR regional approaches team meeting.doc" deleted by
> Tyler Fox/RTP/USEPA/US]
> Tim Smith
> EPA/OAQPS Mail Code C539-04
> Research Triangle Park, NC 27711
> Phone 919 541 4718
> Fax 919 541 0824
> Overnight mail address:
> EPA Mail Code C539-04
> 109 TW Alexander Drive
> Research Triangle Park, NC 27709
```



Re: Draft Reply on: Analytic blueprint issues related to modeling schedule

Tyler Fox to: Norm Possiel

01/27/2009 11:09 AM

Cc: Brian Timin, Douglas Solomon, Marc Houyoux

From:

Tyler Fox/RTP/USEPA/US

To:

Norm Possiel/RTP/USEPA/US@EPA

Cc:

Brian Timin/RTP/USEPA/US@EPA, Douglas Solomon/RTP/USEPA/US@EPA, Marc

Houyoux/RTP/USEPA/US@EPA

Norm

Isn't it important to hightlight that completion of the contribution analysis is dependent upon resolution of the CAIR baseline issue with CAMD? It is for 2012, right? That is a pretty important dependency for scheduling purposes.

Thanks,

Tyler

Norm Possiel/RTP/USEPA/US



Norm Possiel/RTP/USEPA/US 01/27/2009 10:38 AM

To Brian Timin/RTP/USEPA/US@EPA, Marc Houyoux/RTP/USEPA/US@EPA, Douglas Solomon/RTP/USEPA/US@EPA, Tyler Fox/RTP/USEPA/US@EPA

Subject Draft Reply on: Analytic blueprint issues related to modeling schedule

All,

Below in bold is a draft response to the questions posed by Tim. Please reply today/tomorrow with your comments on this. I'd like to reply back to Tim by COB Wednesday.

Thanks.

--- Forwarded by Norm Possiel/RTP/USEPA/US on 01/27/2009 08:59 AM -----



Tim Smith/RTP/USEPA/US

01/26/2009 02:53 PM

- To Norm Possiel/RTP/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA, Marc Houyoux@EPA
- cc Douglas Solomon/RTP/USEPA/US@EPA, Tyler Fox/RTP/USEPA/US@EPA

Subject Analytic blueprint issues related to modeling schedule

1. In the current version of the analytic blueprint for the CAIR replacement rule, the schedule calls for "initial significant contribution analysis" for PM2.5 and ozone by July 31. After discussing this some with Brian, it seems likely that whether this is a realistic date depends on a number of factors (how many

zero-out runs? how many source apportionment runs? are we looking at the entire US? etc etc). The current estimated dates for providing PM2.5 and ozone contribution modeling results are July 1 and July 31, respectively. These dates are "ball park" estimates based on State-level source apportionment modeling for the East only and do not include a break-out of contributions by sector nor any State-level zero-out confirmation runs. We need to do additional testing with the source apportionment technique before we can provide a more refined estimate for this work. We estimate that 10 confirmatory State zero-out runs could be done for PM2.5 by mid/late Sept and ozone by mid/late November. We don't yet have a time estimate for doing sector-specific source apportionment nor for contribution modeling in the West. Given the available computer resources and our run time estimates, it is unlikely that contribution modeling for the West could be done in time to meet the current schedule for the proposed rule.

At some point, it seems to me that some hard decisions may need to be made as to whether the rule is all inclusive and takes longer, or whether the scope narrows and some things get done earlier. Accordingly, would it be useful somewhere in the blueprint to tee up some of these issues? For example, would it be useful to describe in some way how much can be done by July, what assumptions are needed to make that a realistic date?

I think it would be useful to identify in Section VII. SCHEDULES the assumptions associated with the timeline presented in this section. We can provide the assumptions for the AQ modeling milestones.

2. The next item on the schedule calls for "initial options analysis" by August 15. Workgroup ideas for options to be analyzed are listed elsewhere in the blueprint. It appears to me that modeling analysis cannot be accomplished for all of the described options by August 15. Accordingly, it may be useful for you to articulate options and assumptions as to which of these options can be addressed within that time period.

There are a number of different types of options identified in various sections of the blueprint. Some, but perhaps not all, may need AQ modeling in one way or another. We need to have a better understanding of the options in order to estimate the time/resource implications for analyzing them. In this regard, it might be useful to have a discussion which will categorize the options as follows:

- (1) AQ modeling is not needed to develop this option nor to evaluate the AQ impacts of the selected option (i.e., no modeling needed),
- (2) AQ modeling is not needed to develop this option, but will be needed to evaluate the AQ impacts of the selected option.
- (3) AQ modeling is needed to develop this option, but not to evaluate the AQ impacts of the selected option, or
- (4) AQ modeling is needed to both develop this option and evaluate the AQ impacts of the selected option.

Let me know if these questions make sense or not. I think the more realistic understanding we provide the workgroup and managers on what can be done, the better off we will be in the long run. Thanks

Tim Smith EPA/OAQPS Mail Code C539-04 Research Triangle Park, NC 27711 Phone 919 541 4718 Fax 919 541 0824

Overnight mail address:

EPA Mail Code C539-04 109 TW Alexander Drive Research Triangle Park, NC 27709



Fw: Transport Rule

Norm Possiel to: Tyler Fox

03/04/2010 05:59 PM

From:

Norm Possiel/RTP/USEPA/US

To:

Tyler Fox/RTP/USEPA/US@EPA

---- Forwarded by Norm Possiel/RTP/USEPA/US on 03/04/2010 05:58 PM -----

From:

Richard Wayland/RTP/USEPA/US

To:

Tim Smith/RTP/USEPA/US@EPA, Norm Possiel/RTP/USEPA/US@EPA, timin.brian@epa.gov, Bill

Harnett/RTP/USEPA/US@EPA

Date:

03/04/2010 05:56 PM

Subject:

Fw: Transport Rule

Gina has been notified...

Richard A. "Chet" Wayland
Director, Air Quality Assessment Division
U.S. EPA Office of Air Quality Planning & Standards
(919) 541-4603

---- Forwarded by Richard Wayland/RTP/USEPA/US on 03/04/2010 05:56 PM -----

From:

Steve Page/RTP/USEPA/US

To:

Richard Wayland/RTP/USEPA/US@EPA

Date:

03/04/2010 05:52 PM

Subject:

Fw: Transport Rule

fyi

---- Forwarded by Steve Page/RTP/USEPA/US on 03/04/2010 05:52 PM -----

From:

Brian Mclean/DC/USEPA/US

To:

Gina McCarthy/DC/USEPA/US@EPA

Cc:

Steve Page/RTP/USEPA/US@EPA

Date:

03/04/2010 05:49 PM

Subject:

Transport Rule

Gina,

The air quality modeling was completed for the Transport Rule, and yesterday, staff (from OAQPS, OAP, and OGC) met to discuss the results. Although it still shows the air getting cleaner, the number of areas that remain in nonattainment for the 24 hour PM2.5 standard is now more than just Pittsburgh--it appears about 10 cities will not get to attainment. Essentially, the more sophisticated modeling shows that PM2.5 does not decline as much in the winter for a given amount of emissions reductions as the short form modeling showed.

Yesterday, today and over the next few days staff are meeting to figure out exactly how to revise the critical "significant contribution" explanation in the rule package.

I have discussed this with Steve, and we believe that this work is necessary and will require that we move the FAR meeting (scheduled for Monday) and move the delivery date of the rule package to OMB by about 3 weeks, and that we will probably need to move the signature date as well. Steve and I and a few staff could talk to you tomorrow to discuss this further and would like to have a more complete briefing with you next Wednesday or Thursday on our proposal for changes to the rule package.

We are not happy with this news, but are working to move the package forward as quickly as possible.

)



Re: Fw: Baton Rouge and TR Modeling

Tyler Fox to: Rhea Jones

Cc: Brian Timin, Norm Possiel, Tim Smith

07/12/2010 02:12 PM

From:

Tyler Fox/RTP/USEPA/US

To:

Rhea Jones/RTP/USEPA/US@EPA

Cc:

Brian Timin/RTP/USEPA/US@EPA, Norm Possiel/RTP/USEPA/US@EPA, Tim

Smith/RTP/USEPA/US@EPA

Rhea

Probably something that our divisions should discuss beforehand in terms of how to engage and resolve. Clean data findings are based on monitoring data so if it is truly clean then not sure how our projected modeling comes into play except for optics and politics. This issue was brought up early on and hoped not triggered so lets be sure we in OAQPS have a uniform position per policy and modeling before talking and advising Guy.

We can take time to explain that or send quick note about where that information is but that may not be the right discussion. Recall that our base year is 2005 so that starting point rather than more recent ambient data contributes to our projection here.

Thanks,

Tyler

Rhea Jones

Hi Tyler, May I tell Guy that Brian or Norm could...

07/12/2010 01:19:03 PM

From:

Rhea Jones/RTP/USEPA/US

To:

Tyler Fox/RTP/USEPA/US@EPA

Date:

07/12/2010 01:19 PM

Subject:

Fw: Baton Rouge and TR Modeling

Hi Tyler,

May I tell Guy that Brian or Norm could help explain the modeling and the control assumptions included?

Rhea Jones, Group Leader
Geographic Strategies Group
US EPA Office of Air Quality, Planning and Standards
Air Quality Policy Division
MD C539-04
RTP, NC 27711
(919) 541-2940
Forwarded by Phys. Jones/PTP/USEPA/US on 07/12/20

---- Forwarded by Rhea Jones/RTP/USEPA/US on 07/12/2010 01:18 PM ----

From:

Guy Donaldson/R6/USEPA/US

То:

Adina Wiley/R6/USEPA/US@EPA

Cc:

Brian Timin/RTP/USEPA/US@EPA, Michael Feldman/R6/USEPA/US@EPA, Norm

Possiel/RTP/USEPA/US@EPA, Rhea Jones/RTP/USEPA/US@EPA, Sandra Rennie/R6/USEPA/US@EPA, Shannon Snyder/R6/USEPA/US@EPA, Tim

Smith/RTP/USEPA/US@EPA

Date:

07/12/2010 01:09 PM

Subject:

Re: Baton Rouge and TR Modeling

In particular, Louisiana has proposed as part of their Termination Determination that the area has attained the last two years through permanent and enforceable reductions. The region was inclined to agree with them but clearly the transport rule modeling seems to indicate otherwise.

Maybe Louisiana's SIP controls weren't included. Maybe something else is going on but right now the modeling and monitoring seem disconnected.

Baton Rouge and TR Modeling



Baton Rouge and TR Modeling

Adina Wiley to: Rhea Jones, Tim Smith, Brian Timin, Norm Possiel

07/09/2010 03:05 PM

Cc: Sandra Rennie, Guy Donaldson, Shannon Snyder, Michael Feldman

Rhea/Tim/Brian/Norm - Not sure who should handle this question, so I am giving everyone a chance to chime in. Please let me know who will be the point of contact for this issue.

The Transport Rule modeling predicts that Baton Rouge will be nonattainment for the 1997 8-hour ozone standard, with or without the Transport Rule (see slides 17, 18, and 33 from the "TR presentation final - with CAIR comparison slides.pptx).

This prediction contradicts the proposed clean data finding that Region 6 has issued for East Baton Rouge Parish. Our clean data finding was based on monitoring data. Additionally, we will be proposing approval of a determination to terminate section 185 fees based on permanent and enforceable emission reductions in addition to clean data.

Region 6 and Louisiana need some assistance working through the modeling to understand the prediction and how this impacts our clean data finding and the pending termination of section 185 fees.

Thanks in advance for your assistance,

Adina R. Wiley, Environmental Engineer U.S. EPA Region 6
Air Permits Section (6PD-R)
1445 Ross Ave.
Dallas, TX 75202
(214) 665-2115
wiley.adina@epa.gov



Re: Pls Review: Updated AQ Modeling/Timeline for TR1 Final

Tyler Fox to: Norm Possiel

01/19/2011 03:30 PM

Cc: Brian Timin, Kirk Baker, Marc Houyoux, Sharon Phillips

From:

Tyler Fox/RTP/USEPA/US

To:

Norm Possiel/RTP/USEPA/US@EPA

Cc:

Brian Timin/RTP/USEPA/US@EPA, Kirk Baker/RTP/USEPA/US@EPA, Marc Houyoux/RTP/USEPA/US@EPA, Sharon Phillips/RTP/USEPA/US@EPA

Norm

I would go ahead and provide this to Chet to share with Sam along with the following notes:

- +Suggest that he only provide slide 2 but not the more detailed timeline on slide 3.
- +Summarize the things we are doing per overall workload to accomplish this effort per your first bullet below under implications (and benefit of new system)
- +Provide him with the bottomline information from below so he knows what has slipped but that we intend to make it up (please put it in terms that he can repeat in providing to Sam).

Thanks,

Tyler

Norm Possiel

Tyler. The attached file contains the updated TR... 01/19/2011 02:36:10 PM

From:

Norm Possiel/RTP/USEPA/US

To:

Tyler Fox/RTP/USEPA/US@EPA

Cc:

Kirk Baker/RTP/USEPA/US@EPA, Sharon Phillips/RTP/USEPA/US@EPA, Marc

Houyoux/RTP/USEPA/US@EPA, Brian Timin/RTP/USEPA/US@EPA

Date:

01/19/2011 02:36 PM

Subject:

Pls Review: Updated AQ Modeling/Timeline for TR1 Final

Tyler,

The attached file contains the updated TR1 AQ modeling milestones and timeline. Please review. I'll incorporate your comments before I send this to Chet.

Bottom Line:

- The milestone dates for identifying nonattainment/maintenance receptors and for providing the contribution data and AQAT calibration factors to CAMD have slipped by two weeks compared to the target dates in the original schedule. Note that the delay for these milestones would have been greater if we did not have the additional CPUs on terra to reduce the overall model run time.
- The target date for completing AQ modeling for the 2014 final remedy (May 13) has not changed in the new schedule because we will be able to make up for lost time by using the new computer.

We may want to suggest that Chet provide the updated milestones on slide 2 to Sam, but hold back the detailed timeline on slide 3.

Implications for Other Projects:

- The timing of the TR1 runs will affect the sector tagging runs and the HD GHG runs. We've been able to

rearrange the HD GHG runs such that the final completion date won't change from what Sharon has already "promised" to OTAQ. However, the results of the sector tagging runs....which Kirk had planned to provide to HEID/SPPD in late Feb/early March, will likely be delayed until early/mid April.

Relevant Note of Caution:

- The CAMx test runs on terra are progressing....except for PM source apportionment which we've not yet been able to run successfully (CSC, the NCC, and Kirk are working on finding a solution)

Norm

[attachment "Updated AQ Modeling Timeline for TR1 Final.pptx" deleted by Tyler Fox/RTP/USEPA/US]



Re: Feb 28 Update on AQ Modeling for TR1 Final

Norm Possiel to: Tyler Fox

02/28/2011 03:09 PM

From:

Norm Possiel/RTP/USEPA/US

To:

Tyler Fox/RTP/USEPA/US@EPA

Yes.

Tyler Fox

So does this mean that avoiding the computer d...

02/28/2011 03:07:31 PM

From:

Tyler Fox/RTP/USEPA/US

To:

Norm Possiel/RTP/USEPA/US@EPA

Date:

02/28/2011 03:07 PM

Subject:

Re: Feb 28 Update on AQ Modeling for TR1 Final

So does this mean that avoiding the computer down time this weekend allowed us to get these critical pieces done?

Tyler

Norm Possiel

Chet, Here's the latest on the TR1 modeling and... 02/28/2011 03:01:44 PM

From:

Norm Possiel/RTP/USEPA/US

To:

Richard Wayland/RTP/USEPA/US@EPA

Cc:

Tyler Fox/RTP/USEPA/US@EPA, Marc Houyoux/RTP/USEPA/US@EPA, Brian

Timin/RTP/USEPA/US@EPA, Alison Eyth/RTP/USEPA/US@EPA

Date:

02/28/2011 03:01 PM

Subject:

Feb 28 Update on AQ Modeling for TR1 Final

Chet.

Here's the latest on the TR1 modeling and deliverables for CAMD.

- 1. We are working on the projected 2012 design values that will be used to identify the nonattainment/maintenance receptors. We hope to brief you on the results on Wednesday, although we might have to postpone this until later in the week.
- 2. The 2012 PM and Ozone source apportionment runs and the 2014 marginal cost run are done. (This completes all the AQ model runs needed for applying AQAT)
- We are continuing to QA, post-process, and analyze the results
- Before sending the results to CAMD on March 14, we plan to brief you on (1) which States are "in"/"out" for TR1 Final based on the 2012 modeling and (2) which receptors, if any, remain as residual nonattainment/maintenance sites based on the 2014 marginal cost modeling.
- 3. CSC has created the monthly State/sector emissions needed for the application of AQAT. Once I get a reformatted version of the file from CSC I will send the data to CAMD.....expect that this will happen on Wed/Thurs of this week....I will send via email to Jeb and cc you and Sam.

Let us know if you have any questions about the TR1 modeling.

Norm



Re: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

Tyler Fox to: Megan Brachtl

Cc: Norm Possiel

05/03/2011 08:26 PM

From:

Tyler Fox/RTP/USEPA/US

To:

Megan Brachtl/DC/USEPA/US@EPA

Cc:

Norm Possiel/RTP/USEPA/US@EPA

Thanks

Sent by EPA Wireless E-Mail Services

Megan Brachtl

---- Original Message -----From: Megan Brachtl

Sent: 05/03/2011 05:35 PM EDT

To: Tyler Fox Cc: Norm Possiel

Subject: Re: Fw: Followup from Modelling Conversation with Kate in Senator

Whitehouse's office

Hi Tyler -- With a couple of tweaks suggested by Norm, you'll see I forwarded the final responses to Josh

just now.

Thank you to you and Norm for working with me on these!

Best. Megan

Megan V. Brachtl Office of Air Quality Planning and Standards U.S. Environmental Protection Agency tel: 202-564-0397 brachtl.megan@epa.gov

Tyler Fox

Made some additional changes below and if goo... 05/03/2011 05:19:55 PM

From:

Tyler Fox/RTP/USEPA/US

To: Cc: Megan Brachtl/DC/USEPA/US@EPA Norm Possiel/RTP/USEPA/US@EPA

Date:

05/03/2011 05:19 PM

Subject:

Re: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

Made some additional changes below and if good by you both then lets send along.

Thanks,

Tyler

Megan Brachtl

Thanks, Tyler. While you were working on this,... 05/03/2011 04:19:14 PM

From:

Megan Brachtl/DC/USEPA/US

To:

Tyler Fox/RTP/USEPA/US@EPA

Cc:

Norm Possiel/RTP/USEPA/US@EPA

Date:

05/03/2011 04:19 PM

Subject:

Re: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

Thanks, Tyler. While you were working on this, Norm gave me a call and walked me through a few things (thanks, Norm). I like what you've done. I've attempted to make it even simpler (and hopefully what I've written is not complete fiction). How's this?

The analyses performed by States to determine how to meet their SO2 and NOx emissions budgets under the Transport Rule/CAIR are based on the predicted reductions from applying control technologies to specific sources in their emissions inventories. Source apportionment modeling was used in EPA's rulemaking process to assess the inter-state air quality contributions for O3 and PM2.5, not SO2 and NOx emissions from particular sources within the states.

Tyler Fox

Megan Please see the response below with my... 05/03/2011 03:10:35 PM

From:

Tyler Fox/RTP/USEPA/US

To: Cc: Norm Possiel/RTP/USEPA/US@EPA Megan Brachtl/DC/USEPA/US@EPA

Date:

05/03/2011 03:10 PM

Subject:

Re: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

Megan

Please see the response below with my addition that is underlined to see if that better addresses this question. If so, then we are good to go.

Thanks,

Tyler

Norm Possiel

Tyler, Someone modified the response to Q6. I... 05/03/2011 01:40:07 PM

From:

Norm Possiel/RTP/USEPA/US Tyler Fox/RTP/USEPA/US@EPA

To: Cc:

Megan Brachtl/DC/USEPA/US@EPA

Date:

05/03/2011 01:40 PM

Subject:

Re: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

Tyler,

Someone modified the response to Q6. I assumed that this was done intentionally.

Here's essentially what we had in the previous version of the response to this question:

6. On a related note, would any of the state permitting agencies have done source apportionment modeling? Didn't they have to figure out under CAIR which sources to control, to meet their budgets?

The CAIR and Transport Rule State budgets are for SO2 and NOx emissions. The budgets are not based ozone and PM2.5 concentrations nor source apportionment modeling of air quality. Thus, the analyses performed by States to determine how to meet their <u>SO2 and NOx</u> emissions budgets under the <u>Transport Rule</u> have nothing to do with source apportionment modeling are based on the <u>predicted reductions from applying</u> control technologies to specific sources in their emissions inventories for SO2 and NOx.

Is more needed to respond to this question?

Norm

Tyler Fox Norm Per Q6, what do the states use in determi... 05/03/2011 01:28:04 PM

From: Tyler Fox/RTP/USEPA/US

To: Norm Possiel/RTP/USEPA/US@EPA
Cc: Megan Brachtl/DC/USEPA/US@EPA

Date: 05/03/2011 01:28 PM

Subject: Re: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

Norm

Per Q6, what do the states use in determining which sources to control? I think that is the jist of the question and not sure we address it adequately. Can we take a stab here?

Thanks,

Tyler

Norm Possiel Megan, In the email stream below I filled in the p... 05/03/2011 10:49:49 AM

From: Norm Possiel/RTP/USEPA/US

To: Megan Brachtl/DC/USEPA/US@EPA

Cc: Tyler Fox/RTP/USEPA/US@EPA

Date: 05/03/2011 10:49 AM

Subject: Re: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

Megan,

In the email stream below I filled in the placeholders added by Scott in the third paragraph of the response to question 1.

Let me know if you have any further questions about our responses.

Norm

Megan Brachtl Hi Norm -- Here you go. Thanks! ... 05/03/2011 09:34:14 AM

From: Megan Brachtl/DC/USEPA/US

To: Norm Possiel/RTP/USEPA/US@EPA
Cc: Tyler Fox/RTP/USEPA/US@EPA

Date: 05/03/2011 09:34 AM

Subject: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

Hi Norm -- Here you go. Thanks!

Megan V. Brachtl

Office of Air Quality Planning and Standards U.S. Environmental Protection Agency

tel: 202-564-0397

brachtl.megan@epa.gov

---- Forwarded by Megan Brachtl/DC/USEPA/US on 05/03/2011 09:34 AM -----

From:

Scott Mathias/RTP/USEPA/US
Megan Brachtl/DC/USEPA/US@EPA

To: Cc:

Jan Cortelyou-Lee/RTP/USEPA/US@EPA, Richard Wayland/RTP/USEPA/US@EPA, Tyler

Fox/RTP/ÚSEPA/US@EPA

Date:

04/29/2011 04:24 PM

Subject:

Re: Fw: Followup from Modelling Conversation with Kate in Senator Whitehouse's office

see my edits below in RED

someone will need to clarify whether we are referring to the 1997 or 2008 ozone naaqs below in question #1. i suspect that 1997 is what was intended but since these sentences could get taken out of context i wanted to be sure that we always are specific

Scott Mathias Interim Director

U.S. EPA - Air Quality Policy Division

Phone: 919/541-5310

1. Maps showing RI attainment status for SO2, PM, and ozone (understanding the chemistry is a little more complex on ozone) in outgoing years.

We have projected concentrations of PM and ozone for 2012 and 2014 based on air quality modeling performed for the proposed Transport Rule. We do not have projections of the attainment status for SO2.

For PM2.5, the ambient measurements of annual and daily average concentrations during the period 2003 through 2007 at the four monitoring sites in Rhode Island (all in Providence) indicate that Rhode Island is in attainment of the 1997 annual PM2.5 NAAQS and the 2006 daily PM2.5 NAAQS. Our projections of annual and daily PM2.5 for the future indicates the Rhode Island will remain in attainment of these NAAQS through 2014 and likely beyond.

For ozone, the ambient measurements during the period 2003 through 2007 at the three monitoring sites in Rhode Island (Kent, Providence, and Washington counties) indicate that violations of the 1997 8-hour ozone NAAQS were measured at the sites in Kent and Washington counties. More recent measurements, based data for 2007 through 2009, indicate that Rhode Island is currently attaining the 1997 8-hour NAAQS. Our projections of 8-hour ozone for the future indicates the Rhode Island will remain in attainment of the 1997 NAAQS through 2014 and likely beyond.

2. CATR modeling, showing impacts on RI from upwind states/sources (it sounded like EPA might not have source apportionment data but would at least know which states are causing nonattainment in RI).

Our modeling projects that all monitoring sites in Rhode Island will remain in attainment in

the future for the 1997 ozone and annual PM2.5 NAAQS and the 2006 daily PM2.5 NAAQS. The source apportionment modeling for the Transport Rule was performed for the 2012 future base case scenario. We do not have source apportionment data indicating which States are causing nonattainment in Rhode Island since we project that there will be no future nonattianment problems in Rhode Island for these NAAQS.

We do have source apportionment modeling which quantifies the contributions from upwind States to the projected attainment air quality in Rhode Island. The contributions to 8-hour ozone, annual PM2.5, and daily PM2.5 can be found at the following web site: http://www.epa.gov/airquality/transport/tech.html in the file named: Air Quality Contributions Data File (Excel).

3. Then, I had something in my notes that said "monitoring sites in RI (o3 or PM) – appendix? I hope the modelers can remember what someone said could be found in the appendix of a report!

Appendix G in the Transport Rule Proposal Air Quality Modeling Technical Support Document contains maps showing the expected reductions in ozone, annual PM2.5, and daily PM2.5 by county in 2014 due to the SO2 and NOx emissions reductions from the Transport Rule. This document can be obtained at the following web site: http://www.epa.gov/airquality/transport/tech.html in the file named: Air Quality Modeling (PDF).

4. Then, I know EPA said it has not done source apportionment data but my understanding of how you run the future base case scenarios is that you look out a certain number of years if nothing happened (business as usual), and if CATR for instance was implemented. What changes in the modeling runs, then, must be that certain sources are controlled, yes?

Our modeling projects air quality for a future base case scenario and a future case with controls expected from the implementation of the Transport Rule. Emissions reductions are applied to specific sources for the control case modeling. However, our modeling for the Transport Rule does not track the impacts on air quality of controls at each source separately. Rather, our modeling, like the real atmosphere mixes the emissions and calculates the aggregate net impacts on air quality of the emissions reductions modeled.

5. So is there a way to describe which sources the model assumes will be controlled under CATR, in the states that contribute significantly to nonattainment in RI?

The control case emissions data which we use for our modeling does contain information about the control technologies that are applied to individual sources. So, it is possible to identify which sources are controlled in specific States for the Transport Rule. However, since we are projecting Rhode Island to continue to be in attainment there are no States which contribute to nonattainment in Rhode Island.

6. On a related note, would any of the state permitting agencies have done source apportionment modeling? Didn't they have to figure out under CAIR which sources to control, to meet their budgets?

The CAIR and Transport Rule State budgets are for SO2 and NOx emissions, not for ozone and PM2.5 concentrations.



Fw: Pls Review: Briefing for Senate EPW Rs on EPA modeling

Norm Possiel to: Tyler Fox

08/12/2011 02:40 PM

From:

Norm Possiel/RTP/USEPA/US

To:

Tyler Fox/RTP/USEPA/US@EPA

Any comments?

---- Forwarded by Norm Possiel/RTP/USEPA/US on 08/12/2011 02:40 PM -----

From:

Norm Possiel/RTP/USEPA/US Tyler Fox/RTP/USEPA/US@EPA

To: Cc:

Kirk Baker/RTP/USEPA/US@EPA

Date:

08/11/2011 12:15 PM

Subject:

Pls Review: Briefing for Senate EPW Rs on EPA modeling

Tyler,

Here's a first draft of the briefing for EPW on AQ modeling that Kirk and I have put together. Please reply with your comments/suggestions.



Air Quality Modeling_MATS & CSAPR_v3.pptx

FYI, here's the draft briefing on IPM from CAMD.



Senate EPW IPM and Power Sector Regs 0811_v2.ppt

Norm

---- Forwarded by Norm Possiel/RTP/USEPA/US on 08/11/2011 12:11 PM ----

From:

Richard Wayland/RTP/USEPA/US

To:

Tyler Fox/RTP/USEPA/US@EPA

Cc:

Kirk Baker/RTP/USEPA/US@EPA, Norm Possiel/RTP/USEPA/US@EPA

Date:

08/08/2011 04:32 PM

Subject:

Re: Fw: Confirming details re: briefings for Senate EPW Rs on EPA modeling

Not sure what's behind all this, but they still want me to do the briefing and prefer that I go up in person. Soooo... if you guys can put a air quality modeling 102 (not 101... a little more details) briefing with some slides on what we did for CSAPR and MATS (esp. source apportionment in general terms) that would be helpful.

Looks like it will be scheduled for next Thursday 8/18, so probably need the briefing no later than Monday to be able to get cleared by PACS and DC to send over to the Hill.

Thanks.

Chet

Richard A. "Chet" Wayland
Director, Air Quality Assessment Division
U.S. EPA Office of Air Quality Planning & Standards
Mail Code C304-02, RTP, NC 27711
Phone: (919) 541-4603, Cell: (919) 606-0548

Tyler Fox	Chet Thanks for the details here and agree that i 08/08/2011 03:00:28 PM
From:	Tyler Fox/RTP/USEPA/US
To:	Richard Wayland/RTP/USEPA/US@EPA
Cc:	Norm Possiél/RTP/USEPA/US@EPA, Kirk Baker/RTP/USEPA/US@EPA
Date:	08/08/2011 03:00 PM
Subject:	Re: Fw: Confirming details re: briefings for Senate EPW Rs on EPA modeling

Chet

Thanks for the details here and agree that it would seem best for Norm to present and for us to include Kirk and use of CMAQ for MATS rule given that it is included here and likely spills over into Mercury modeling.

I will talk with Norm once he gets back in the office on Weds and we can pull together the materials and determine the who later.

Tyler

Richard Wayland	See the note below from Josh if you can get m	08/08/2011 02:57:18 PM
Lori Stewart	I am out on leave the week of August 15. I belie	08/04/2011 05:42:41 PM
Lorie Schmidt	18th and 17th (in that order) would be best for m	08/04/2011 05:27:36 PM
Alison Davis	We are checking on schedules for one of our fol	08/04/2011 05:16:19 PM
Jeb Stenhouse	Hi Josh - thanks, after your email and after talkin	08/04/2011 05:08:24 PM
Josh Lewis	Thanks Jeb, and sorry for the confusion. In talki	08/04/2011 11:31:38 AM
Jeb Stenhouse	Hi Josh, We're considering how to staff these bri	08/03/2011 04:57:24 PM
Josh Lewis	Lori/Jeb/Tyler/Bryan: Sending this to the 4 of yo	08/02/2011 10:10:15 AM